# Before the FEDERAL COMMUNICATIONS COMMISSION Washington, D.C. 20554

SEP 1 8 19951

MM Docket No. 95-111

RM - 8652

FEDERAL COMMUNICATIONS COMMISSION

In the Matter of )
Amendment of Section 73.202(b) )
Table of Allotments )
FM Broadcast Stations )
Channels 241A and 242A )
ATHENS and ATLANTA, ILLINOIS )

DOCKET FILE COPY ORIGINAL

TO: Chief, Allocations Branch Mass Media Bureau

# COMMENTS AND COUNTERPROPOSAL

Atlantis Broadcasting Co. L.L.C. (hereafter Atlantis), by its attorneys, and pursuant to Sections 1.401 and 1.420 of the Commission's rules, hereby submits its Comments and Counterproposal, requesting the Commission to amend Section 73.202(b) of its rules, the FM Table of Allotments, to allot Channel 242A (96.3 mHz) at Atlanta, Illinois in lieu of the proposed allotment of Channel 241A (96.1 mHz) at Athens, Illinois. In support thereof, the following is stated:

1. By Notice of Proposed Rule Making, DA 95-1514, released July 26, 1995, the Chief, Allocations Branch, Policy and Rules Division, Mass Media Bureau, has proposed to allot Channel 241A to Athens, Illinois, as that community's first local transmission service. In his Notice (¶ 3), the Chief observes that Channel

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<sup>1/</sup> Channel 242A and Atlanta have been added to the above-caption.

241A can be allotted to Athens in compliance with the Commission's minimum distance separation requirements with a site restriction of 7.4 kilometers (4.6 miles) southwest of Athens in order to avoid a short-spacing to the licensed site of Station WHOW(FM), Channel 240A, Clinton, Illinois and Station KMXG(FM), Channel 241C1, Clinton, Iowa. Interested parties were invited to file comments on or before September 18, 1995 (Ibid. ¶5).

- 2. Atlantis hereby proposes to allot Channel 242A at Atlanta, Illinois, in lieu of the proposed allotment of Channel 241A at Athens. This Counterproposal is consistent with the Cutoff Procedures set forth in the Appendix to the Notice and with Section 1.420(d) of the Commission's Rules ("Counterproposals advanced in this proceeding itself will be considered if advanced in initial comments, so that parties may comment on them in reply comments." Appendix, ¶ 3(a)).
- 3. There is annexed as Appendix A hereto a channel allocation study prepared by T. Z. Sawyer Technical Consultants which demonstrates that Channel 242A may be allotted to Atlanta, Illinois with a site restriction approximately 5.7 kilometers (3.5 miles) to the southwest of the geographic reference point of that community. Channel 242A can be allotted to Atlanta in compliance with the minimum distance separation and principal community coverage requirements of the rules (Ibid., p. 1, Table 1). The Channel 242A allotment at Atlanta is mutually exclusive with the proposed allotment of Channel 241A at Athens.

- 4. Atlanta is an incorporated place located in Logan County, Illinois. Atlanta has a population of 1,616 and Logan County a population of 30,798 (1990 Census). The proposed Channel 242A allotment would provide a first local (aural) transmission service to Atlanta. Athens is an incorporated place located in Menard County, Illinois. Athens has a population of 1,404 and Menard County has a population of 11,164 (1990 Census). The proposed Channel 241A allotment would provide a first local (aural) transmission service to Athens.
- 5. The Commission established the following FM allotment priorities in Revision of FM Assignment Policies and Procedures, 90 FCC2d 88 (1982):
  - (1) First full-time aural service;
  - (2) Second full-time aural service;
  - (3) First local service; and
  - (4) Other public interest matters.
- 6. Based upon the present record, the allotment of Channel 241A at Athens and the mutually exclusive allotment of Channel 242A at Atlanta would both provide the respective communities with a first local (aural) transmission service (Priority 3). The Commission en banc has recently affirmed:

[I]n a choice among competing counterproposals both involving priority 3 (first local service), the Commission has uniformly made the decision based on population difference and a comparison of reception services. And, where it has found that neither community falls below a threshold level of reception services, the Commission has based its decision on a straight population comparison.

Athens is located <u>circa</u> 12 miles north of Springfield, Illinois, and would, therefore, receive primary service from at least the following stations: WFMB-FM, WNNS(FM), WQQL(FM), WDBR(FM) and WYMG(FM). According to Arbitron, the Springfield market is served by 11 commercial radio stations (<u>Broadcasting & Cable Yearbook 1995</u>, p. B-647 (Appendix B hereto)).

FM Table of Allotments (Blanchard, Arkansas and Stephens, Arkansas), FCC 95-327, released September 11, 1995 (¶11).

- 7. In <u>Blanchard</u>, <u>supra</u>, the population difference between <u>Blanchard</u> (1990 population 1,175) and Stephens (1990 population 1,137) was 38 persons (<u>Tbid</u>., ¶¶ 2, 3). Concluding that under "long-standing precedent" this "population difference is dispositive" the Commission affirmed its allotment at Blanchard (<u>Tbid</u>., ¶ 13).
- 8. In this case, the population difference between Atlanta (1990 population 1,616) and Athens (1990 population 1,404) is 212 persons. The proposed Atlanta allocation will, therefore, advance the objectives of Section 307(b) of the Communications Act of 1934, as amended, and the Commission's FM allocation policies.
- 9. Atlantis hereby states that if the Commission grants this Counterproposal, it will apply for Channel 242A when it is allotted to Atlanta, and, if its application is granted, it will promptly build the station.

WHEREFORE, for the foregoing reasons, Atlantis respectfully requests the Commission to grant this Counterproposal and to allot Channel 242A to Atlanta, Illinois, in lieu of Channel 241A to Athens, Illinois.

Respectfully submitted,

ATLANTIS BROADCASTING CO. L.L.C.

Bv:

James K. Edmundson

GARDNER, CARTON & DOUGLAS 1301 K Street, N.W. Suite 900, East Tower Washington, D.C. 20005 (202) 408-7162

DATED: September 18, 1995

[133550.1]

APPENDIX A

TECHNICAL EXHIBIT
PETITION TO MODIFY
FM TABLE OF ALLOTMENTS
CHANNEL 242A
ATLANTA, ILLINOIS

Proponent: Atlantis Broadcasting Co. L.L.C.

**Narrative** 

The technical exhibit of which this narrative is part was prepared on behalf of Atlantis Broadcasting Co. L.L.C., in support of a counterproposal to modify the FM Table of Allotments (47CFR 73.202) to add FM Channel 242A as a fully spaced Class A FM Commercial Service, to serve the community of Atlanta, Illinois.

Channel 242A, if allocated to Atlanta, Illinois will require that it be "site restricted" approximately 5.7 kilometers (3.5 miles) to the southwest of the Atlanta U.S.G.S. Geographical Reference Point. This site restriction to the southwest will not inhibit the channel from serving the entire city of license.

This site restriction is necessary to comply with the required separation distances from the various transmitter site locations proposed in the applications for Channel 243A at Farmington, Illinois.

As an aid in determining the feasibility of the proposed allocation, a suitable site which meets the separation requirements for Channel 242A was selected with the following geographical coordinates:

40° 13' 22" North Latitude 89° 17' 04" West Longitude.

A separation study was conducted from this site and the results of the study are contained herein as Table I. The allocation of Channel 242A at Atlanta, Illinois, meets all separation requirements.

No other AM, FM or Television assignments are licensed to this incorporated community, which is listed in the 1990 U.S. Census as having a population of 1,616 persons.

Further information, if required, concerning the technical merits or methods employed in the preparation of this technical narrative may be obtained by contacting the office of the undersigned.

September 13, 1995

Timothy Z. Sawyer

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Chevy Chase, MD 20815

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E-mail to: engineers@sawyer.com

T.Z. Sawyer Technical Consultants Chevy Chase, MD

# FM SEPARATION STUDY

| Job Title :ATLANTA IL CHANNEL 242A |  |                          |                    | Separation Buffer 64 km<br>FCC DB Date : 09/07/95 |             |                 |                       |
|------------------------------------|--|--------------------------|--------------------|---|-------------|-----------------|-----------------------|
| Channel                            | 242A ( 96.3 MHZ)                           |                          |                    | Coordinates                                       |             |                 |                       |
| Call<br>Status                     | City<br>State FCC File No.                 | Channel<br>Freq.         | ERP(kW)<br>HAAT(m) |   |             |                 | Req.<br>(km)          |
| WAIZ<br>CP                         | Seneca<br>IL BPH900517MI                   |                          | 3.0<br>100.0       | 41-12-38<br>88-32-21                              | 29.5        |                 | 31<br>CLEAR           |
| WHOWFM<br>LIC                      | Clinton<br>IL BLH6898                      | 240A<br>95.9             | 3.00<br>91.0       | 40-05-43<br>88-57-51                              |             | 30.75<br>25     | <u></u>               |
| PADD<br>PRM-Si                     | Athens<br>IL RM8652<br>te Restricted 7.4km | 241A<br>96.1<br>(4.6 mi) |                    | 39-53-57<br>89-46-04<br>t                         |             | 54.71<br>-17.29 |                       |
| WLTM<br>CPM                        | Rantoul<br>IL BMPH950525IG                 | 2 <b>41A</b><br>96.1     | 3.8 DA<br>123.0    | 40-13-27<br>88-17-56                              | 89.6<br>SS  |                 | 72<br>CLOSE           |
| KMXG<br>LIC                        | Clinton<br>IA BLH861017KB                  | 241C1<br>96.1            | 100.<br>299.0      | 41-37-58<br>90-24-38                              | 329.3       |                 | 133<br>CLEAR          |
| KYAT<br>CPM                        | Keokuk<br>IA BMPH940518IP                  | 242C2<br>96.3            | 18.0<br>253.0      | 40-25-19<br>91-35-42                              | 277.2       |                 | 166<br>CLEAR          |
| KIHT<br>LIC                        | St. Louis<br>MO BLH810420AE                | 242C1<br>96.3            | 100.<br>168.0      | 38-36-47<br>90-20-09                              | 207.1       |                 | 200<br>CLOSE          |
| KIHT<br>CP                         | St. Louis<br>MO BPH940322IH                |                          | 80.0<br>313.0      | 38-34-24<br>90-19-30                              | 206.3<br>ss |                 | 200<br>CLOSE          |
| WBBMFM<br>LIC                      | Chicago<br>IL BLH891019KA                  |                          |                    | 41-52-44<br>87-38-10                              | 36.4        |                 | 178<br>CLEAR          |
| NEW<br>APP                         | Farmington 950522MB                        |                          | 4.1<br>116.0       | 40-40-11<br>89-53-34                              | 314.2       |                 | 72 <u>/3</u><br>SHORT |

 $<sup>\</sup>frac{/1}{/2}$  Rounds to nearest kilometer (31 kilometers and meets separation requirements). This is a counterproposal to the proposed Athens, Il. allocation on Channel 241A.  $\frac{/3}{/2}$  Rounds to the nearest kilometer(72 kilometers and meets separation requirements).

T.Z. Sawyer Technical Consultants Chevy Chase, MD

#### FM SEPARATION STUDY

Job Title :ATLANTA IL CHANNEL 242A Separation Buffer 64 km FCC DB Date : 09/07/95 Coordinates: 40-13-22 89-17-04 Channel 242A ( 96.3 MHZ) Channel ERP(kW) Call City Latitude Bearing Dist. Req. Status State FCC File No. Freq. HAAT(m) Longitude deg-Tru (km) (km) \_\_\_\_\_\_ Farmington 243A 6.0 40-41-58 313.5 IL 950524ME 96.5 100.0 89-56-59 NEW 77.38 72 APP 5.38 CLOSE 243A 40-44-11 315.3 80.74 72 Farmington 96.5 .0 ALC 89-57-30 8.74 CLOSE T L Effective 11-18-88 243A 6.0 40-43-21 IL 950525MG 96.5 100.0 89-59-37 NEW 313.0 81.84 72 9.84 CLOSE APP 243A 3.0 41-18-35 18.1 127.13 72
IL BLH920316KE 96.5 100.0 88-48-44 WKOT LIC 55.13 CLEAR WIHN Normal 244A 3.9 40-28-34 36.9 35.29 31 IL BLH920430KG 96.7 125.0 LIC 89-02-02 4.29 CLOSE WCVSFM Virden 244A 6.0 DA 39-33-26 203.3 80.47 31 LIC IL BLH930930KF 96.7 100.0 89-39-24 49.47 CLEAR WLBHFM Mattoon 96.9 152.0 245B 50. 39-31-02 134.9 110.71 69 IL BLH6155 88-22-13 41.71 CLEAR LIC 295B 50. WSWT Peoria 295B 50. 40-43-22 IL BLH5527 106.9 146.0 89-30-40 Peoria 40-43-22 341.0 58.76 15 43.76 CLEAR LIC 3.00 40-06-34 97.7 90.29 10 WPGU Urbana 296A 72.0 BLH800317AL 107.1 LIC IL88-14-06 80.29 CLEAR

<sup>\*\*</sup> End of separation study for channel 242A \*\*

APPENDIX B

gwerside-San Bernardino, CA: Rank 28

MSA: 1,347,800; TSA: 2,098,000 Stations: KABE-FM, KATY-FM, KCAL, KCAL-FM, KCKC, KDIF, KFRG-FM, KGGI-FM, KHPY, KLFE, KMEN, KMET, KOLA-FM, KOOJ-FM, KPRO, KSDT, KSZZ, KTOT-FM, KVAR-FM, KWRM, KWRP-FM,

Roanoke-Lynchburg, VA: Rank 99
MSA: 374, 100; TSA: 1,034,700
Stations: WAMV, WBLT, WBRG, WFIR, WGOL-FM, WJJX-FM, WJLM-FM, WKBA, WKDE, WKDE-FM, WKPA, WLDJ-FM, WLLL, WLOE, WLVA, WLYK-FM, WPVR-FM, WRDJ-FM, WRIS, WROV, WROV-FM, WSLC, WSLQ-FM, WTOY, WTTX, WTTX-FM, WVLR, WWWR, WXLK-FM, WYMY-FM, WYYD-FM.

Rochester, MN: Rank 244

MSA: 91,600; TSA: 388,400 Stations: KMFX-FM, KNXR-FM, KOLM, KRCH-FM, KROC, KROC-FM, KWEB, KWWK-FM, KYBA-FM.

Rochester, NY: Rank 44

Rochester, NY: Rank 44
MSA: 897,500; TSA: 1,172,900
Stations: WACK, WASB, WBBF, WBEE-FM, WCGR, WCMF, WCMF-FM, WDCZ-FM, WDKX-FM, WDNY, WDNY-FM, WEZO-FM, WFLK-FM, WGVA, WHAM, WHTK, WJZR-FM, WKLX-FM, WKDA-FM, WLX-FM, WMAX-FM, WNNR-FM, WNNR-FM, WNNR-FM, WNNR-FM, WNNR-FM, WRY-FM, WRMM-FM, WNROL-FM, WCGA-FM, WCGA-FM, WCGA-FM, WROL-FM, WOR-FM, WWG, WYSL, WROL-FM, WROL-FM, WVOR-FM, WWWG, WYSL,

Rockford, K.: Renk 148 MSA: 244,100; TSA: 540,200 Stations: WBEL, WKMQ-FM, WLUV, WLUV-FM, WNTA, WQFL-FM, WROK, WRRR, WRWC-FM, WXRX-FM, WXXQ-FM, WZOK-FM.

Secremento, CA: Rank 29
MSA: 1,340,800; TSA: 2,851,900
Stations: KAHI, KCTC, KFBK, KFIA, KGBY-FM,
KGLE-FM, KHTK, KHYL-FM, KJAY, KNCI-FM, KOWL,
KOBR-FM, KOPT-FM, KRAK-FM, KRCX, KRLT-FM,
KRXQ-FM, KSEG-FM, KSFM-FM, KSMJ, KSQR,
KSSJ-FM, KSTE, KSXX-FM, KTHO, KWOD-FM,
KXQA, KXQA-FM, KYMX-FM, KZSA-FM.

Seginaw-Bay City-Midland, Mt: Rank 118
MBA: 329,000; TSA: 1,131,500
Stations: WBTZ-FM, WCEN-FM, WGER-FM, WHNN-FM, WIOG-FM, WIXC-FM, WKCQ-FM, WKOX, WKQZ-FM, WMAX, WMPX, WSAM, WSGW, WTCF-FM, WTLZ-FM, WUVE-FM.

St. Cloud, MN: Rank 215

MSA: 130,100; TSA: 361,300 Stations: KASM, KCLD-FM, KKSR-FM, KLZZ-FM, KMSR-FM, KMXK-FM, KNSI, KXSS, WHMH-FM, WJON, WQPM-FM, WVAL, WWJO-FM.

St. Louie: Renk 17
MSA: 2,096,500; TSA: 2,734,900
Stations: KATZ, KDJR-FM, KEZK-FM, KFAV-FM,
KFNS, KFUO-FM, KHAD, KIHT-FM, KIPIL, KICF, KISL,
KLOU-FM, KLPW, KLPW-FM, KMJM-FM, KMOX,
KNZ-FM, KPNT-FM, KSD, KSD-FM, KSHE-FM, KSN,
KSLQ, KSLQ-FM, KSTL, KTUI, KTUI-FM, KWRE,
KXEN, KXOK-FM, KYKY-FM, WBGZ, WCBW-FM,
WESL, WEW, WFUN-FM, WGNU, WHCO, WIBY, WILFM, WINU, WJBM, WKBQ, WKBQ-FM, WKKX-FM,
WRTH, WRYT, WVRV-FM.

Sallebury-Ocean City, MD: Rank 154 MSA: 223,500; TSA: 422,300 Stations: WAFL-FM, WDMV, WDNO-FM, WDSD-FM, WETT, WGMD-FM, WICO, WICO-FM, WJDY, WJPY, WKHI-FM, WLVW-FM, WOCQ-FM, WOLC-FM, WOSC-FM, WOBL-FM, WSBL-FM, WSBY-FM, WSSR, WSUX-FM, WTGM, WWFG-FM, WXJN-FM, WXPZ-FM, WYUS, WZBH-FM.

Selt Lake City-Ogden-Provo: Rank 35

MSA: 1,138,000; TSA: 1,520,400

Stations: KALL, KANN, KAPN, KBER-FM, KBZN-FM,
KCNR, KDYL, KEYY, KFAM, KHON, KISN, KIBN-FM,
KKAT-FM, KKDS, KLLB, KLO, KLZX-FM, KMGR,
KMXB-FM, KNFL, KNFL-FM, KNUC-FM, KODJ-FM,
KOVO, KRGQ, KRGQ-FM, KRSP-FM, KSFI-FM, KSL,
KSOP, KSOP-FM, KSOS, KSOS-FM, KSRR, KSVN,
KTKK, KTLE-FM, KTUR, KUJJ-FM, KUMT-FM, KUTQ-FM, KVRI-FM, KXRK-FM, KYFO, KYFO-FM, KZHT-FM.

San Angelo, TX: Rank 251 MSA: 82,700; TSA: 128,300 Stations: KDCD-FM, KELI-FM, KGKL, KGKL-FM, KIXY-FM, KKSA, KSJT-FM.

San Antonio: Rank 34

San Artonio: Hank 34
MSA: 1,166,500; TSA: 1,768,200
Stations: KAJA-FM, KBOP, KBUC-FM, KCHG, KCHL,
KCOR, KCYY-FM, KDIL-FM, KDRY, KEDA, KENS,
KGNB, KISS-FM, KKYX, KLUP, KNBT-FM, KONO,
KONO-FM, KQXT-FM, KRIO-FM, KROM-FM, KSAH,
KSLL-FM, KSLR, KSMG-FM, KTFM-FM, KTKR, KTSA, KWED, KXTN, KXTN-FM, KZEP, KZEP-FM, WOAI.

San Diego: Rank 15
MSA: 2,212,500; TSA: 2,212,500
Stations: KBAX-FM, KBNN-FM, KBZT-FM, KCBQ, KCBQ-FM, KCEO, KCLX-FM, KFMB, KFMB-FM, KFSD-FM, KGB-FM, KIPM-FM, KIOZ-FM, KJQY-FM, KKLQ-FM, KKOS-FM, KOGO, KOWF-FM, KPOP, KPRZ, KSDO, KSON, KSON-FM, KSPA, KURS, KYXY-FM, XEBG, XEMO, XEXX, XHFG-FM, XHKY-FM, XHRM-FM, XHTZ-FM, XLTN-FM, XTRA, XTRA-FM.

San Francisco: Rank 4

San Francisco: Rank 4
MSA: 5,330,700; TSA: 8,418,300
Stations: KABL, KARA-FM, KATD, KAZA, KBAY-FM,
KBGG-FM, KBLX-FM, KBRG-FM, KCBS, KDFC,
KDFC-FM, KDIA, KEAR-FM, KEST, KEZR-FM, KFAX,
KFOG-FM, KFIC, KFRC-FM, KGO, KHCIT-FM, KIOI-FM, KIQI, KITS-FM, KJAZ-FM, MOHI, MCHI-FM, KKIO-FM, KKIS, KKSF-FM, KKSJ, KLCO-FM, KLIV, KLOK,
KMEL-FM, KMGG-FM, MOKIN, KNBR, KNEW, KNTA,
KOFY, KOIT, KOIT-FM, KOME-FM, KPIX, KPIX-FM,
KRPO-FM, KROR-FM, KRRS, KRTY-FM, KSAN-FM,
KSFO, KSJO-FM, KSJX, KSOL-FM, KSQO-FM, KSRO,
KUFX-FM, KUIC-FM, KVON, KVTO, KVYN-FM, KXBT,
KXFX-FM, KYCY-FM, KZST-FM, KZWC-FM. KXFX-FM, KYCY-FM, KZST-FM, KZWC-FM.

San Jose, CA: Rank 30 MSA: 1,302,400; TSA: 3,531,300 Note: Part of San Francisco Metro.

San Luis Obiapo, CA: Rank 167 MSA: 193,600; TSA: 346,500 Stations: KBAI, KDDB-FM, KGLW, KIID, KIQO-FM, KIXT-FM, KJDJ, KKAL, KKJG-FM, KOTR-FM, KPRL, KSLY-FM, KSTT-FM, KUHL, KVEC, KWBR-FM, KWSP-FM, KWWV-FM, KZOZ-FM.

Santa Berbera, CA: Rank 182 MSA: 169,400; TSA: 679,500 Stations: KCQR-FM, KDB-FM, KHTY-FM, KIST, KKSB, KMGQ-FM, KQSB, KRUZ-FM, KSBL-FM, KSPE, KTMS, KTYD-FM.

Santa Fe. NM: Renk 234

MSA: 106,000; TSA: 755,800 Stationa: KBAC-FM, NBOM-FM, KDCE, KIOT-FM, KNLA-FM, KNYN-FM, KRSN, KSWV, KTRC, KVSF.

Sante Rosa, CA: Rank 115 MSA: 348,800; TSA: 348,800 Note: Part of San Francisco Metro.

Saracota-Bradenton, FL: Rank 78
MSA: 481,100; TSA: 598,900
Stations: WAMR, WBRD, WCTQ-FM, WDUV-FM, WENG, WISP-FM, WICKY, WQSA, WSPB, WSRZ-FM, WTMY.

Savannah, GA: Rank 153

Savannah, Ga: Hank 183 MSA: 224,800; TSA: 835,200 Stations: WAEV-FM, WBMQ, WCHY, WCHY-FM, WEAS, WEAS-FM, WFXH, WGCO-FM, WIXV-FM, WIZA, WJCL-FM, WLOW-FM, WLVH-FM, WNMT, WQQT-FM, WRHQ-FM, WSGA, WSOK, WZAT-FM.

ttie-Tacoma: Rank 13

Seattle-Tiscoma: Rank 13
MSA: 2,698,500; TSA: 3,241,000
Stationa: KARR, KBLE, KBLV, KBRO, KBSG, KBSG-FM, KCIS, KCMS-FM, KENU, KEZX, KEZX-FM,
KGNW, KING, KING-FM, KIRO, KIRO-FM, KISW-FM,
KITZ, KIXI, KJR, KJR-FM, KJUN, KKOZ, KKMO, KLAY,
KLSY-FM, KMPS, KMPS-FM, KMTT, KMTT-FM, KNDD-FM, KNTB, KOMO, KPLZ-FM, KPOZ, KRIZ, KRKO,
KRPM-FM, KFWM-FM, KUBE-FM, KULL, KVI, KWYZ,
KYCM-EM, KZTZ-KZOK-FM. KYCW-FM, KZIZ, KZOK-FM.

Shreveport, LA: Rank 127

MSA: 302,300; TSA: 798,200 Stations: KASO, KASO-FM, KBCL, KBSF, KDKS-FM, KEEL, KFLO, KIOU, KITT-FM, KLKL-FM, KMJJ-FM, KNCB, KOKA, KRMD, KRMD-FM, KTAL-FM, KTKC-FM, KTUX-FM, KVKI-FM, KWHN-FM, KWKH, KWKH-

Slouix City, IA: Rank 243 MSA: 95,800; TSA: 259,600 Stationa: KGLI-FM, KKMA-FM, KKSC, KMNS, KSCJ, KSEZ-FM, KSUX-FM, KTFC-FM, KTFJ.

Sloux Falls, SD: Rank 212 MSA: 130,200; TSA: 362,100 Stations: KCGN, KELO, KELO-FM, KKLS-FM, KLQL-FM, KMXC-FM, KQAD, KRRO-FM, KSOO, KTWB-FM, KWSN, KXRB.

South Bend, IN: Rank 159
MSA: 211,500; TSA: 616,000
Stations: WAOR-FM, WBYT-FM, WFRN-FM, WGTC-FM, WHLY, WHME-FM, WLLJ, WNDU, WNDU-FM, WNSN-FM, WRBR-FM, WSBT, WUBU-FM.

Spokane, WA: Rank 91
MSA: 391,800; TSA: 747,000
Stations: KAQQ, KAZZ-FM, KCDA-FM, KDRK-FM,
KEYF, KEYF-FM, KEZE-FM, KGA, KISC-FM, KJPB,
KKCH-FM, KKPL, KKZX-FM, KNFR-FM, KNJY-FM,
KSBN, KSVY, KTRW, KTSL-FM, KUDY, KVNI, KOLY, KXLY-FM, KZZU-FM.

Springfield, IL: Rank 190
MSA: 161,900; TSA: 363,200
Stations: WCVS-FM, WDBR-FM, WFMB, WFMB-FM, WLLJ-FM, WMAY, WNNS-FM, WQLZ-FM, WQQL-FM, WTAX, WYMG-FM.

Springfield, MA: Rank 75
MSÅ: 508,200; TSA: 567,700
Stations: WACE, WACM, WACY, WACY-FM, WAPE, WHMP, WHMP-FM, WHYN, WHYN-FM, WMAS, WMAS-FM, WNNZ, WPKX-FM, WRNX-FM, WSPR,

Springfield, MO: Rank 148
MSA: 238,800; TSA: 584,000
Stations: KADI-FM, KGEXI-FM, KGMY, KGMY-FM,
KIDS, KLFJ, KLTO-FM, KOSP-FM, KTOZ, KTOZ-FM,
KTTS, KTTS-FM, KTXR-FM, KWTO, KWTO-FM,
KXUS-FM, KZBE-FM.

ternford-Norwelk, CT: Renk 134 MSA: 280, 100; TSA: 280, 100 Note: Part of New York Metro.

State College, PA: Renk 230 MSA: 112,300; TSA: 177,200 Stations: WBHV-FM, WBLF, WFGI-FM, WMAJ, WPHB, WPHB-FM, WCWK-FM, WRSC, WZWW-FM.

Stockton, CA: Rank 84 MSA: 415,200; TSA: 478,300 Stations: KCVR, KEXX-FM, KJAX, KJOY-FM, KOOD-FM, KSTN, KSTN-FM, KWG, KWIN-FM.

o, NY: Rank 60

Syracuse, NT; Rank 88
MSA: 555,200; TSA: 1,005,000
Stations: WAQX-FM, WBB8-FM, WDCW, WFBL,
WGES-FM, WHEN, WHEN-FM, WKRL-FM, WMCR,
WMCR-FM, WNDR, WNTQ-FM, WOLF, WPCX-FM,
WSCP, WSCP-FM, WSEN-FM, WSGO, WSW, WSYR,
WTLA, WTKW-FM, WVOA-FM, WYYY-FM, WZOS-FM,
W777 W777

Tallahassee, FL: Rank 179
MSA: 188,800; TSA: 430,000
Stations: WAIB-FM, WANM, WBZE-FM, WCVC,
WGLF-FM, WHBT, WHBX-FM, WJPH-FM, WMFL,
WMLO-FM, WNLS, WRZK-FM, WSNI-FM, WTAL,
WTNT-FM, WUMX-FM, WWSD, WXSR-FM.

Tampe-St. Peteroburg-Clearwater: Rank 21 MSA: 1,864,200; TSA: 3,032,500 Stations: WAMA, WBDN, WBSB-FM, WCOF-FM, WDAE, WDCF, WFLA, WFLZ-FM, WFNS, WGUL, WGUL-FM, WHNZ, WHPT-FM, WLVJ, WLVJ-FM, WMTX, WMTX-FM, WNZE, WPSO, WCBN, WCYK, WQYK-FM, WRBO, WRBQ-FM, WRMD, WRXS, WSUN, WTAN, WTIS, WTMP, WUSA-FM, WWJB, WWRM-FM, WXTB-FM, WYUJ-FM, WZ-HR.

Terre Haute, IN: Renk 181

MSA: 170,700; TSA: 458,500

Stations: WACF-FM, WAXI-FM, WBFX, WBOW, WCBH-FM, WJSH, WKZI, WLEZ-FM, WMGI-FM, WMMC-FM, WNDI, WNDI-FM, WPRS, W8DM, WSDM-FM, WTHI, WTHI-FM, WWVR-FM, WZZQ-FM.

Texarkana, TX-AR: Rank 238

MSA: 100,400; TSA: 273,400

Stationa: KCMC, KHSP, KHSP-FM, KKYR, KKYR-FM, KLLI-FM, KNBO, KPYN-FM, KTOY-FM, KTWN, KTWN-FM, KXAR-FM, KZRB-FM.

Toledo, OH: Rank 74
MSA: 511,300; TSA: 1,087,100
Stationa: WCWA, WFOB, WHMQ-FM, WIOT-FM, WJVM, WIOKO-FM, WLOR-FM, WMTRI-FM, WRON-FM, WSPD, WTOD, WTWR-FM, WVKS-FM, WVOI, WWWM, WWWM-FM, WXKR-FM, WYHK-FM.

# CERTIFICATE OF SERVICE

I, Virginia L. Davidson, a secretary in the law offices of Gardner, Carton & Douglas, do hereby certify that true copies of the foregoing "COMMENTS AND COUNTERPROPOSAL" were sent September 18, 1995, First-Class United States mail, postage prepaid, or as indicated by hand to the following:

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